

**Shasta County Air Quality Management District**

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**Evaluation Report  
Regarding Proposed Issuance of a  
Title V Operating Permit to**

**Sunset Plastics, Inc**

**for Equipment Located at:**

**6250 Parallel Road  
Anderson, CA**

**2/6/98**

**Evaluation Report  
Regarding Proposed Issuance of a  
Title V Operating Permit**

**Introduction**

The district proposes to issue a Title V operating permit to Sunset Plastics, Inc. for equipment located at 6270 Parallel Road, Anderson, CA. This evaluation with the proposed Title V operating permit sets forth the legal and factual basis for the conditions contained in the proposed permit.

**Facility Description**

Sunset Plastics, inc. operates a fiberglass spa, bathtub, and shower manufacturing facility. Sunset Plastics, Inc. is considered a federal Major Source and subject to the Title V permitting program due to the facility's potential to emit Hazardous Air Pollutants (HAP's), in particular, styrene.

**Equipment Description**

The major equipment located at Sunset Plastics, Inc. include:

One (1) Front Chop Booth and One (1) Gel Coat Booth  
Exhausted Through One (1) 48" I.D. X 40' H Exhaust Stack  
One (1) Back Chop Booth Exhausted Through  
One (1) 48" I.D. X 40' H Exhaust Stack  
One (1) Cutting & Grinding Booth

As approved by the U.S. Environmental Protection Agency (U.S. EPA), all equipment exempted from permit, per Shasta County Air Quality Management District Rule 2.5, are each considered an insignificant activity. These include the following:

1 - 6,000 gallon polyester resin storage tank  
1 - 0.20 MMBTU/Hr natural gas fired space heater  
1 - 0.25 MMBTU/Hr natural gas fired space heater  
1 - 0.40 MMBTU/Hr natural gas fired space heater

**Applicable Federal Requirements :**

Based upon information submitted in the application and the district's review, the following applicable federal requirements apply to Sunset Plastics, Inc.:

**SIP Requirements:**

## **Rule 1:2, Definitions**

This rule lists the definitions used throughout the District rule book. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

## **Rule 2.1A, Permits Required**

These are the District 's requirements for preconstruction permits and permits to operate. This rule is an administrative rule, and Sunset Plastics, Inc certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

## **Rule 2:5, Exemptions**

This rule lists the types of devices or operations that the APCO may exempt. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

## **Rule 2:6, Open Burning (2:6.a.4(c) & 2:6.b)**

This rule lists the regulations required to conduct open burning operations. Sunset Plastics, Inc. does not conduct open burning operations at this facility and the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

## **Rule 2:7, Conditions for Open Burning**

This rule lists the regulations required to conduct open burning operations. Sunset Plastics, Inc. certified compliance with this requirement in the application. However, Sunset Plastics, Inc. does not conduct open burning operations at this facility and the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

## **Rule 2:10, Action on Applications**

This rule requires that an application for an Authority to Construct be filed in a manner and on the form prescribed by the APCO. The District feels that the environmental benefits are not

such that this rule should be included in the proposed Title V permit.

**Rule 2:11, Fees**

This rule requires that renewal fees be paid in accordance with the fee schedule contained in the rule. Rule V mandates that a presumptive fee schedule be used in conjunction with the current fees collected by the District. There is no environmental benefit to include this rule in the proposed Title V permit.

**Rule 2:12, Expiration of applications**

This rule requires that an Authority to Construct application will expire after the Permit to Operate has been issued or two years after the Authority to Construct was issued unless construction has commenced on the site. It also states that a Permit to Operate application will expire two years after being issued. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 2:14, Testing Facilities**

This rule requires the operator to provide and maintain testing and sampling facilities as specified in the Authority to Construct or Permit to Operate. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 2:17, Status of permit (formerly Rule 2:20)**

This rule requires the permittee to notify the District in writing of any significant change in any item of information submitted to the District. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 2:18, Applications Deemed Denied**

This rule requires that unless information is submitted in order to deem an application complete within 30 days, the application is denied. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However,

the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 2:21, Defacing Permit (formerly Rule 2:24)**

This rule requires that a permit not be defaced. This requirement is included in the proposed Title V permit.

**Rule 2:23, Posting of Permit**

This rule requires that the permit be posted. This requirement is included in the proposed Title V permit.

**Rule 2:25, Public Records**

This rule lists the requirements for what may or may not be public records and includes labeling requirements. This requirement is included in the proposed Title V permit.

**Rule 2:26, Revocation of Permit**

This rule lists the requirements for revoking a permit. This requirement is included in the proposed Title V permit.

**Rule 2:27, Submittal of Information**

This rule lists the requirements for the permittee to submit information to the District concerning the nature, extent, quality, or degree of air contaminants. This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 3:1, Applicability of State Laws**

This rule adopts by reference all state and federal rules for air contaminants. This requirement is included in the proposed Title V permit.

**Rule 3.2, Specific Air Contaminants**

This rule specifies limits for emissions of:

- 1) Combustion particulate matter in gr/dscf;
- 2) Particulate matter less than or equal to 10 microns in gr/dscf;
- 3) All other particulate matter in gr/dscf
- 4) Particulate matter process weight: maximum hourly emissions as a function of process weight in tons per hour;
- 5) Oxides of Sulfur (as SO<sub>2</sub>) in ppm;

- 6) Oxides of Nitrogen (as NO<sub>2</sub>) in ppm;
- 7) Total Reduced Sulfur; and
- 8) Opacity.

For the combustion grain loading limit, substantial documentation (such as U.S. EPA 's Compilation of Air Pollution Factors , AP-42) exists that demonstrates that the combustion of natural gas in space heaters results in a very low particulate emission rate. As shown by the compliance calculations contained in attachment 2 of the application, these low emission rates from the space heaters using natural gas will satisfy the requirements of Rule 3.2. Therefore, requiring a regular program of monitoring would not significantly enhance the ability of the permit to assure compliance with this requirement and a regular program of monitoring has not been specified in the draft permit. In addition to the above, these units are considered to be insignificant emission units due to the low BTU ratings.

The permit is conditioned to require testing using the appropriate test methods upon the request of the APCO for all equipment at the facility. Source testing for particulate in the past has demonstrated that the particulate emissions emitted from the stack are well below Rule 3:2 emission limits. Therefore a regular program of monitoring would not significantly enhance the ability of the permit to assure compliance with this requirement and a regular program of monitoring has not been specified in the draft permit.

The SO<sub>2</sub> emissions from the boilers are dependent upon the sulfur content of the gas--that is, the sulfur in the natural gas will be emitted as SO<sub>2</sub> upon combustion. All combustion equipment at this facility utilizes PUC natural gas. The maximum sulfur content allowed in PUC regulated natural gas is 100 ppm. Combustion of this gas in all fuel burning equipment will result in emissions well below the requirements of Rule 3.2 and therefore use of PUC regulated natural gas will assure compliance with the SO<sub>2</sub> limit in all fuel burning equipment. The permit is conditioned to require testing using the appropriate test methods upon the request of the APCO. Therefore, requiring a regular program of monitoring would not significantly enhance the ability of the permit to assure compliance with this requirement and a regular program of monitoring has not been specified in the draft permit.

This rule requires the discharge of air contaminants from sources located at the facility meet specified opacity limits. This generally applicable requirement is included in the proposed Title V permit. Because all the fuel burning equipment uses PUC



regulated natural gas, these requirements are expected to be satisfied on a continual basis. The opacity limits of Rule 3:2 from the stacks at the spray booths are also expected to be satisfied on a continual basis because of the nature of the process. This process entails the spraying of fiberglass and resin together. The weight of the fiberglass/resin combination prevents it from staying airborne because of its impaction either on the piece being fiberglassed or on the filter medium. The Permit has been conditioned to require that filters be maintained and in place in the spray booths at all times. This requirement ensures that no fiberglass/resin mixture will be emitted from the stack to cause an opacity emission. Therefore, requiring a regular program of monitoring exhaust emissions would not significantly enhance the ability of the permit to assure compliance with this requirement and a regular program of exhaust emission monitoring has not been specified in the draft permit.

**Rule 3:6, Circumvention**

This rule requires that emissions cannot be concealed by circumvention. This requirement is included in the proposed Title V permit.

**Rule 3:7, Enforcement**

This rule requires that the rules and regulations be enforced by the APCO. This requirement does not pertain to Sunset Plastics, Inc. Therefore, this requirement was not included in the Title V permit.

**Rule 3:9, Recommendations of Control Officer**

This rule states that no recommendation of the APCO is a guaranty that the recommended device or process will result in compliance.

This rule is an administrative rule, and Sunset Plastics, Inc. certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 3:11, Local Rules**

This rule states that any city or public agency, having authority to do so, may enact by ordinance more restrictive than contained in the District's rule book. Because this permit is a federal permit and does not concern local rules, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Rule 5, Additional procedures for issuing permits to operate for sources subject to Title V of the Federal Clean Air Act Amendments of 1990 .**

This rule lists the requirements of the Title V program. All requirements imposed by this rule are included in the proposed Title V permit.

**40 CFR 82.161**

This regulation requires that equipment utilizing ozone depleting substances be maintained by certified technicians. These requirements are included in the proposed Title V permit.

**REQUIREMENTS THAT DO NOT APPLY:**

**Rule 2:4, Permit to Sell or Rent**

This rule pertains to the use of incinerators. There are no incinerators at this facility. Therefore, this requirements is not applicable to this facility.

**Rule 2:8, Agricultural Burning**

This rule applies only to agricultural burning operations. This facility does not conduct agricultural operations. Therefore, this requirement is not applicable to this facility.

**Rule 3:3, Gasoline Storage**

This rule requires all storage tanks storing gasoline, with capacity of 250 gallons or more, to be equipped with one of the following: permanent submerged fill pipe, a vapor recovery system, or a floating roof. Sunset Plastics, Inc. does not have a gasoline storage tank. Therefore, this requirement is not included in the proposed Title V permit.

**Rule 3:4, Industrial use of Organic Solvents**

This rule requires a control device achieving 87 percent control efficiency be utilized unless complying with a listed lbs/day limits. This facility uses acetone as the cleaning solvent. Acetone is an exempt VOC per EPA. Therefore, this requirement is not included in the Title V permit.

**Rule 3:5, Agricultural Uses**

This rule exempts discharges in the course of applying agricultural materials. This facility does not apply agricultural materials. Therefore, this requirement is not included in the proposed Title V permit.

**Rule 3:12, Reduction of Matter of Animal Origin (Except Curing of Glue)**

This rule mandates controls for reducing animal matter. Sunset Plastics, Inc. does not reduce animal matter as part of the process. Therefore, this requirement is not included in the proposed Title V permit.

**Rule 3:14, Petroleum Dry Cleaners**

This rule mandates control and operating practices for dry cleaning operations. Sunset Plastics, Inc. does not operate a dry cleaning machine at this facility. Therefore, this requirement is not included in the proposed Title V permit.

**Rule 3:15, Cutback Asphalt**

This rule requires certain cutback asphalt not to be used. Sunset Plastics, Inc. does not apply cutback asphalt at this facility. Therefore, this requirement is not included in the proposed Title V permit.

**Rule 3:17, Organic Solvent Degreasing Operations**

This rule requires degreasing operations to meet design and operating practices specifications. This rule was repealed by the District when the District adopted a revised organic solvent operations rule. The new rule has not been submitted for inclusion into the SIP. In addition, the facility uses acetone for their degreasing solvent and acetone is not regulated as a VOC or a HAP. Any use of an alternative solvent would be regulated by District Rule 3:4 (included as a permit condition). Therefore, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

**Prevention of Significant Deterioration (PSD) Permitting**

This regulation sets the procedures for the review of new or the modification of existing stationary sources for federal attainment pollutants. The PSD regulation is not applicable to this facility because the facility does not exceed the trigger levels for PSD, nor is listed as an applicable facility.

### **Risk Management Plans Preparation and Registration, 112(r)**

Section 112(r), Accidental Release Prevention and Management Program, affects facilities at which certain substances are present above the specified annual threshold. None of the compounds present at Sunset Plastics, Inc. are present above the 112(r) thresholds. Therefore 112(r) is not applicable to this facility.

### **MACT Standards for Halogenated Solvent Cleaning Operations**

This regulation requires degreasers using certain halogenated solvents to meet certain requirements. Because the degreaser does not use solvents regulated by the standard, the MACT standard is not an applicable requirement for this facility. The permit is conditioned so that the permittee notify the District prior to changing the type of solvent used at the facility.

**40 CFR Part 60, Subpart KB - Standards of Performance for  
Volatile Organic Liquid Storage Vessels (including Petroleum  
Liquid Storage Vessels) for Which Construction, Reconstruction,  
or Modification Commenced After July 23, 1984.**

This regulation specifies requirements for a storage vessel with a capacity greater than 40 cubic meters (10,556.8 gallons) that is used to store VOC liquids. The storage vessel at Sunset is a 6,000 gallon storage vessel. Therefore, this requirement is not applicable.

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